

[Final]

**Administrative Record Index
for the
ST. AUGUSTINE GAS COMPANY Non-Time-Critical Removal Site**

1.0 PRE-REMEDIAL**1.8 Preliminary Assessment Documents**

1. Cross-Reference: "St. Augustine Gasification Plant, aka: St. Augustine Gas Company, aka: St. Augustine Gas Service, Inc., FLD101835528, Preliminary Assessment". (March 28, 1988) [Filed and cited as Reference 9 to entry 1 in 1.10 PRE-REMEDIAL - Expanded Site Inspection Documents].

1.9 Site Inspection Documents

1. Cross-Reference: "Final Report, Site Inspection, St. Augustine Gas Company, St. Augustine, St. Johns County, Florida". (October 22, 1991) [Filed and cited as Reference 2 to entry 1 in 1.10 PRE-REMEDIAL - Expanded Site Inspection Documents].

1.10 Expanded Site Inspection Documents

1. "Final Expanded Site Inspection, St. Augustine Gas Company, St. Augustine, St. Johns County, Florida". (April 22, 1997)

2.0 REMOVAL RESPONSE**2.1 Correspondence**

1. Memorandum from David Lloyd, EPA Region IV, to Richard D. Green, EPA Region IV. Requesting management approval to conduct an Engineering Evaluation/Cost Analysis (EE/CA) at the St. Augustine Gas Company Site. (July 29, 1997)
2. Letter from Larry C. Bradbury, Atlanta Gas Light Company, to James Cummings, EPA-HQ. Transmitting the EE/CA Work Plan for the former MGP site in St. Augustine, Florida. (June 24, 1998)
3. Letter from Larry C. Bradbury, Atlanta Gas Light Company, to Rick Rachal, Florida Department of Environmental Protection (FDEP). Transmitting the EE/CA Work Plan for the former MGP site in St. Augustine, Florida. (June 24, 1998)
4. Memorandum from Curt Fehn, EPA Region IV to Gary Bennett, EPA Region IV. Concerning request for oversight of the EE/CA to be conducted at the site. (August 17, 1998)
5. Memorandum from Timothy Simpson, EPA Region IV, to David Lloyd, EPA Region IV. Concerning field overview conducted at the site. (September 29, 1998)
6. Memorandum from Charles Till, EPA Region IV, to David Lloyd, EPA Region IV. Concerning field sampling overview conducted at the site. (October 29, 1998)
7. Letter from David Lloyd, EPA Region IV, to Steve Whiteside, GEI Consultants, Inc. Concerning proposed additional sampling and EPA approval of updated schedule. (December 10, 1998)
8. Letter from Larry C. Bradbury, Atlanta Gas Light Company, to David Lloyd, EPA Region IV. Concerning proposed additional field investigations. (February 23, 1999)
9. Letter from David Lloyd, EPA Region IV, to Larry C. Bradbury, Atlanta Gas Light Company. Concerning EPA review of the additional field investigation proposal. (March 04, 1999)
10. Letter from Larry Bradbury, Atlanta Gas Light Company, to David Lloyd, EPA Region IV. Concerning proposed monitoring well installation and groundwater sampling. (April 22, 1999)
11. Letter from Stephen L. Whiteside, GEI Consultants, Inc., to David Lloyd, EPA Region IV. Responding to EPA request for additional information made at July 28, 1999 meeting. (August 24, 1999)
12. Letter from Ben T. Foster, GEI Consultants, Inc., to Rick Rachal, FDEP. Regarding excavation of MGP impacted soil and source material. (February 23, 2000)

[Final]

**Administrative Record Index
for the
ST. AUGUSTINE GAS COMPANY Non-Time-Critical Removal Site**

2.0 REMOVAL RESPONSE**2.2 Sampling and Analysis Data**

1. Letter from David Lloyd, EPA Region IV, to Anna Sullivan, GEI Consultants, Inc. Concerning EPA comments on the Draft Sampling and Analysis Work Plan dated November 19, 1997. (March 03, 1998)
2. Memorandum from William N. O'Steen, EPA Region IV, to David Lloyd, EPA Region IV. Concerning review of the EE/CA Sampling and Analysis Plan. Comments were transmitted by the attached letter of March 4, 1998 from David Lloyd, EPA Region IV, to Anna Sullivan, GEI Consultants, Inc. (March 03, 1998)
3. Letter from Anna Sullivan, GEI Consultants, Inc., to David Lloyd, EPA Region IV. Concerning response to EPA comments on the Draft EE/CA Sampling and Analysis Work Plan and the Approach to the Streamlined Risk Evaluation. (May 20, 1998)
4. Letter from Lawrence C. Bradbury, Atlanta Gas Light Company, to David Lloyd, EPA Region IV. Concerning clarification of parameters and wells to be sampled during the next groundwater sampling event during the week of March 29, 1999. (March 19, 1999)
5. Memorandum from John P. McConney, EPA Region IV, to David Lloyd, EPA Region IV. This memo transmits a review of the EE/CA Analytical Data. (August 18, 1999)
6. "Engineering Evaluation/Cost Analysis Analytical Data, St. Augustine Former MGP Site, St. Augustine, Florida" GEI Consultants, Inc. (April 11, 2000)

2.4 Work Plans and Progress Reports

1. Memorandum from Dan Thoman, EPA Region IV, to David Lloyd, EPA Region IV. Concerning review of the EE/CA Work Plan. (January 13, 1997)
2. "Work Plan, Engineering Evaluation/Cost Analysis, St. Augustine Former MGP Site, Phase I: Marina Development Project, Sampling and Analysis Plan, Streamlined Risk Evaluation Plan, Focused Feasibility Study Plan, Health & Safety Plan, and Quality Assurance Plan," GEI Consultants, Inc. (June 12, 1998)
3. Letter from William B. Harris, City of St. Augustine, and Larry Bradbury, Atlanta Gas Light Company, to David Lloyd, EPA Region IV. Transmitting, and requesting review of, the Final EE/CA Work Plan. (June 16, 1998)
4. Letter from David Lloyd, EPA Region IV, to Anna Sullivan, GEI Consultants, Inc. Concerning EPA review of the EE/CA Work Plan dated June 12, 1998. (July 21, 1998)
5. Letter from Stephen L. Whiteside, GEI Consultants, Inc., to David Lloyd, EPA Region IV. This letter transmits Progress Report No. 1 for the period ending October 10, 1998. (October 13, 1998)
6. Letter from Stephen L. Whiteside, GEI Consultants, Inc., to David Lloyd, EPA Region IV. This letter transmits Progress Report No. 2 for the period ending November 7, 1998. (November 12, 1998)
7. Letter from Stephen L. Whiteside, GEI Consultants, Inc., to David Lloyd, EPA Region IV. This letter transmits Progress Report No. 3 for the period ending November 28, 1998. (December 03, 1998)
8. Letter from Stephen L. Whiteside, GEI Consultants, Inc., to David Lloyd, EPA Region IV. This letter transmits Progress Report No. 4 for the period ending January 9, 1999. (January 14, 1999)
9. Letter from Stephen L. Whiteside, GEI Consultants, Inc., to David Lloyd, EPA Region IV. This letter transmits Progress Report No. 5 for the period ending March 9, 1999. (March 12, 1999)

[Final]

**Administrative Record Index
for the
ST. AUGUSTINE GAS COMPANY Non-Time-Critical Removal Site**

2.0 REMOVAL RESPONSE**2.4 Work Plans and Progress Reports**

10. Letter from Stephen L. Whiteside, GEI Consultants, Inc., to David Lloyd, EPA Region IV. This letter transmits Progress Report No. 6 for the period ending April 17, 1999. (April 23, 1999)
11. Letter from Stephen L. Whiteside, GEI Consultants, Inc., to David Lloyd, EPA Region IV. This letter transmits Progress Report No. 7 for the period ending May 15, 1999. (May 21, 1999)
12. Letter from Stephen L. Whiteside, GEI Consultants, Inc., to David Lloyd, EPA Region IV. This letter transmits Progress Report No. 8 for the period ending June 19, 1999. (June 28, 1999)
13. Letter from Stephen L. Whiteside, GEI Consultants, Inc., to David Lloyd, EPA Region IV. This letter transmits Progress Report No. 9 for the period ending July 31, 1999. (August 20, 1999)
14. Letter from Ben T. Foster, GEI Consultants, Inc., to David Lloyd, EPA Region IV. Transmitting the work plan for additional assessment activities. (October 05, 1999)
15. Letter from Ben T. Foster, GEI Consultants, Inc., to David Lloyd, EPA Region IV. Transmitting the revised work plan for additional assessment activities. (October 11, 1999)
16. Letter from Ben T. Foster, GEI Consultants, Inc., to David Lloyd, EPA Region IV. Concerning the proposed installation of two additional monitoring wells. (November 19, 1999)
17. Letter from Stephen L. Whiteside, GEI Consultants, Inc., to David Lloyd, EPA Region IV. This letter transmits Progress Report No. 10 for the period ending November 27, 1999. (November 30, 1999)
18. Letter from Stephen L. Whiteside, GEI Consultants, Inc., to David Lloyd, EPA Region IV. This letter transmits Progress Report No. 11 for the period ending January 1, 2000. (January 10, 2000)
19. Letter from Anna Sullivan, GEI Consultants, Inc., to Mark Fite, EPA Region IV. This letter transmits Progress Report No. 12 for the period ending January 31, 2000. (February 01, 2000)
20. Letter from Anna Sullivan, GEI Consultants, Inc., to Mark Fite, EPA Region IV. This letter transmits Progress Report No. 13 for the period ending April 30, 2000. (May 02, 2000)
21. Letter from Mark J. Fite, EPA Region IV, to Richard S. Rachal III, FDEP. Transmitting the draft Proposed Plan and requesting FDEP comments. (July 14, 2000)
22. Memorandum from William N. O'Steen, EPA Region IV, to Mark Fite, EPA Region IV. Transmitting a review of the draft Proposed Plan for Removal Action. (July 31, 2000)
23. "U.S. Environmental Protection Agency Superfund Proposed Plan Fact Sheet, Saint Augustine Gas Plant, Removal Action Memorandum". (August 2000)
24. Letter from Richard S. Rachal, FDEP, to Mark J. Fite, EPA Region IV. Transmitting FDEP review of the draft Proposed Plan. (August 01, 2000)

2.8 Removal Response Reports

1. Memorandum from Linda George, Integrated Laboratory Systems, to David Lloyd, EPA Region IV. This memo transmits ecological risk review comments for the EE/CA. (December 31, 1997)
2. Letter from J. Mitch King, Fish and Wildlife Service, to David Lloyd, EPA Region IV. This letter transmits a review of the draft EE/CA. (March 06, 1998)
3. Memorandum from Tom Dillon, National Oceanic and Atmospheric Administration (NOAA), to David Lloyd, EPA Region IV. This letter transmits NOAA's review of the draft EE/CA. (March 10, 1998)
4. Memorandum from H. Glenn Adams, EPA Region IV, to David Lloyd, EPA Region IV. Concerning review of the Draft Approach to the Streamlined Risk Evaluation. (May 27, 1998)

[Final]

**Administrative Record Index
for the
ST. AUGUSTINE GAS COMPANY Non-Time-Critical Removal Site**

2.0 REMOVAL RESPONSE**2.8 Removal Response Reports**

5. Letter from Anna Sullivan, GEI Consultants, Inc., to David Lloyd, EPA Region IV. This letter transmits the EE/CA for the St. Augustine Former MGP Site. (July 15, 1999)
6. Memorandum from Linda George, Integrated Laboratory Systems, to David Lloyd, EPA Region IV. This memo transmits ecological risk review comments for the EE/CA. (August 10, 1999)
7. Memorandum from H. Glenn Adams, EPA Region IV, to David Lloyd, EPA Region IV. This memo transmits a review of the EE/CA. (August 17, 1999)
8. Memorandum from William N. O'Steen, EPA Region IV, to David Lloyd, EPA Region IV. This memo transmits a review of the draft EE/CA. (August 26, 1999)
9. Letter from David Lloyd, EPA Region IV, to Anna Sullivan, GEI Consultants, Inc. Regarding EPA comments for the July 15, 1999 EE/CA. (September 21, 1999)
10. Letter from Richard S. Rachal, Florida Department of Environmental Protection (FDEP), to Anna Sullivan, GEI Consultants, Inc. Concerning FDEP review of the EE/CA assessment data. (September 29, 1999)
11. Memorandum from Tom Dillon, National Oceanic and Atmospheric Administration (NOAA), to David Lloyd, EPA Region IV. This memo transmits NOAA's review of the EE/CA. (October 12, 1999)
12. "Revised Engineering Evaluation/Cost Analysis, St. Augustine Former MGP Site, St. Augustine, Florida, Volume I: Text," GEI Consultants, Inc. (April 06, 2000)
13. "Revised Engineering Evaluation/Cost Analysis, St. Augustine Former MGP Site, St. Augustine, Florida, Volume II: Tables, Figures, and Plates," GEI Consultants, Inc. (April 06, 2000)
14. "Revised Engineering Evaluation/Cost Analysis, St. Augustine Former MGP Site, St. Augustine, Florida, Volume III: Appendices A through I," GEI Consultants, Inc. (April 06, 2000)
15. Letter from Anna Sullivan, GEI Consultants, Inc. to Mark J. Fite, EPA Region IV. Transmitting the revised EE/CA and offering responses to EPA, FDEP, and NOAA comments. (April 06, 2000)
16. Memorandum from Mark J. Fite, EPA Region IV, to Elmer Akin, EPA Region IV, Robert Caplan, EPA Region IV, Jeffrey Dehner, EPA Region IV, Tom Dillon, NOAA, and Richard Rachal, FDEP. Concerning request for review of the EE/CA. (April 12, 2000)
17. Memorandum from William N. O'Steen, EPA Region IV, to Mark Fite, EPA Region IV. Concerning review of the revised EE/CA. (May 03, 2000)
18. Memorandum from Linda S. George, Integrated Laboratory Systems, to Mark J. Fite, EPA Region IV. Concerning review of the revised EE/CA. (May 25, 2000)
19. Memorandum from H. Glenn Adams, EPA Region IV, to Mark Fite, EPA Region IV. Concerning review of the revised EE/CA dated April 2000. (June 28, 2000)
20. Memorandum from Tom Dillon, NOAA, to Mark Fite, EPA Region IV. Transmitting NOAA's comments on the revised EE/CA. (July 17, 2000)
21. Letter from Mark J. Fite, EPA Region IV, to Anna Sullivan, GEI Consultants, Inc. Transmitting EPA comments on the EE/CA dated April 6, 2000. (July 18, 2000)
22. Letter (with attachments) from Anna Sullivan, GEI Consultants, Inc. to Mark J. Fite, EPA Region IV. Transmitting response to EPA comments on the April 6th EE/CA. (July 28, 2000)

[Final]

**Administrative Record Index
for the
ST. AUGUSTINE GAS COMPANY Non-Time-Critical Removal Site**

2.0 REMOVAL RESPONSE**2.8 Removal Response Reports**

23. Letter from Ben Foster, GEI Consultants, Inc., to Rick Rachal, Florida Department of Environmental Protection. This letter transmitted GEI's responses to FDEP's comments on the EE/CA for the St. Augustine Gas Superfund Site. (August 18, 2000)
24. Letter from William L. Pence, Akerman Senterfitt (attorneys representing the City of St. Augustine), to Mark Fite, EPA Region IV (with attachments). This letter transmitted copies of letters received by the City of St. Augustine from the U. S. Army Corps of Engineers and the U. S. Fish and Wildlife Service. (September 21, 2000)

2.9 Action Memoranda

1. Electronic Mail message from Guy D. VanDoren, to Mark Fite, EPA Region IV. This letter provided comments on the EE/CA for the St. Augustine Gas Superfund Site. (August 15, 2000)
2. Letter from Mark Fite, EPA Region IV, to Richard S. Rachal, Florida Department of Environmental Protection (without attachment). This letter transmitted a review copy of the DRAFT Action Memorandum for the St. Augustine Gas Company Removal Action. (September 13, 2000)
3. Memorandum from William O'Steen, EPA Region IV, to Mark Fite, EPA Region IV. This memorandum provided review comments on the DRAFT Action Memorandum for the St. Augustine Gas Company Removal Site. (September 14, 2000)
4. H. Glenn Adams, EPA Region IV, to Mark Fite, EPA Region IV. This memorandum provided review comments on the DRAFT Action Memorandum for the St. Augustine Gas Company Removal Site. (September 21, 2000)
5. Memorandum from Linda S. George, Integrated Laboratory Systems, to Mark Fite, EPA Region IV. This memorandum provided ecological risk review comments on the DRAFT Action Memorandum for the St. Augustine Gas Company Removal Site. (September 21, 2000)
6. Memorandum from Tom Dillon, NOAA, to Mark Fite, EPA Region IV. This memorandum provided review comments on the DRAFT Action Memorandum for the St. Augustine Gas Company Removal Site. (September 21, 2000)
7. Letter from Richard Rachal, Florida Department of Environmental Protection. This letter provided review comments on the DRAFT Action Memorandum for the St. Augustine Gas Company Removal Site. (September 22, 2000)
8. Action Memorandum from Mark Fite, EPA Region IV, to Richard D. Green, EPA Region IV. A request and authorization for a non-time critical removal action to be conducted at the St. Augustine Gas Company Removal Site, St. Augustine, St. Johns County, Florida. (September 27, 2000)

10.0 ENFORCEMENT**10.11 EPA Administrative Orders**

1. Administrative Order on Consent for Engineering Evaluation and Cost Analysis In the Matter of: St. Augustine Gas Site, St. Augustine Florida, City of St. Augustine, Atlanta Gas Light Company, Respondents, Docket No. 98-23-C. (September 15, 1998)

**Administrative Record Index
for the
ST. AUGUSTINE GAS COMPANY Non-Time-Critical Removal Site**

11.0 POTENTIALLY RESPONSIBLE PARTIES (PRP)**11.9 PRP-Specific Correspondence**

1. Letter from Curt Fehn, EPA Region IV, to William Harriss, City of St. Augustine and Lawrence C. Bradbury, Jr., Atlanta Gas Light Company. Regarding notice of potential liability. (December 19, 1997)

13.0 COMMUNITY RELATIONS**13.6 Community Relations Plans**

1. "Community Relations Plan for the Former Manufactured Gas Plant, St. Augustine, Florida". (November 1999)

13.7 News Clippings and Press Releases

1. "EPA Announces Public Meeting and Comment Period on th Proposed Removal Action for the St. Augustine Gas Plant Site, St. Augustine, Florida," EPA Region IV. (August 11, 2000)
2. "Gas plant cleanup will cost millions," Peter Quinta, St. Augustine Record. (August 11, 2000)
3. "Gas plant cleanup unveiled by EPA," Michael Reed, St. Augustine Record. (August 23, 2000)

13.8 Public Meetings

1. "For The Environmental Protection Agency, In Re: Proposed Removal Action for the St. Augustine, Florida, Gas Plant, Transcript of the Public Hearing," Advanced Verbatim Reporting, Inc.. (August 22, 2000)

13.9 Fact Sheets

1. Fact Sheet, St. Augustine Gas Plant Site. (September 1998)
2. "Notice of Public Comment Period Extension, St. Augustine Gas Plant Site, St. Augustine, Florida," EPA Region IV. (August 11, 2000)
3. Memorandum from Tom Dillon, NOAA, to Mark Fite, EPA Region IV. This memorandum provide comments on the Proposed Plan Fact Sheet for the St. Augustine Gas Company Removal Site. (August 18, 2000)

16.0 NATURAL RESOURCE TRUSTEE**16.1 Correspondence**

1. Cross-Reference: Letter from J. Mitch King, Fish and Wildlife Service, to David Lloyd, EPA Region IV. This letter transmits a review of the draft EE/CA. (March 06, 1998) [Filed and cited as entry 2 of 2.8 REMOVAL RESPONSE - Removal Response Reports].
2. Letter from David A. Lloyd, EPA Region IV, to John Costigan, FDEP. Notifying Natural Resource Trustees of potential resource damages. (March 19, 1998)
3. Letter from David A. Lloyd, EPA Region IV, to Tom M. Dillon, NOAA. Notifying Natural Resource Trustees of potential resource damages. (March 19, 1998)
4. Cross-Reference: Memorandum from Tom Dillon, National Oceanic and Atmospheric Administration (NOAA), to David Lloyd, EPA Region IV. This memo transmits NOAA's review of the EE/CA. (October 12, 1999) [Filed and cited as entry 10 of 2.8 REMOVAL RESPONSE - Removal Response Reports].

[Final]

**Administrative Record Index
for the
ST. AUGUSTINE GAS COMPANY Non-Time-Critical Removal Site**

16.0 NATURAL RESOURCE TRUSTEE

16.1 Correspondence

5. Cross-Reference: Memorandum from Mark J. Fite, EPA Region IV, to Elmer Akin, EPA Region IV, Robert Caplan, EPA Region IV, Jeffrey Dehner, EPA Region IV, Tom Dillon, NOAA, and Richard Rachal, FDEP. Concerning request for review of the EE/CA. (April 12, 2000) [Filed and cited as entry 15 of 2.8 REMOVAL RESPONSE - Removal Response Reports].
6. Cross-Reference: Memorandum from Tom Dillon, NOAA, to Mark Fite, EPA Region IV. Transmitting NOAA's comments on the revised EE/CA. (July 17, 2000) [Filed and cited as entry 19 of 2.8 REMOVAL RESPONSE - Removal Response Reports].
7. Cross Reference: Letter from William L. Pence, Akerman Senterfitt (attorneys representing the City of St. Augustine), to Mark Fite, EPA Region IV (with attachments). This letter transmitted copies of letters received by the City of St. Augustine from the U. S. Army Corps of Engineers and the U. S. Fish and Wildlife Service. (September 21, 2000) [Filed and cited in Entry Number 24 of 2.8 REMOVAL RESPONSE - Removal Response Reports]

17.0 SITE MANAGEMENT RECORDS

17.7 Reference Documents

1. Letter from John Hall, COE, to City of Jacksonville (c/o Jack Cubbedge. This letter informed the City of Jacksonville that the COE had granted conditional approval for a dredge permit. (September 19, 1997)

17.8 State and Local Technical Records

1. Letter form Russell Price, Florida Department of Environmental Protection, to Jack Cubbedge, City of Jacksonville, Florida. A letter of approval of modification of Wetland Resource Management Permit No.: 552198279. (April 20, 2000)